

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF NEW YORK**

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NATIONWIDE SALES AND SERVICES INC. et al.	:
Plaintiffs	:
v.	:
	:
ENVIROCARE TECHNOLOGIES INTERNATIONAL, LTD	: Civil Action No.:
et al.	: 16 cv 6617 DRH-GRB
Defendants.	:
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ENVIROCARE TECHNOLOGIES INTERNATIONAL, LTD	:
et al.	:
Counterclaim Plaintiffs	:
v.	:
	:
NATIONWIDE SALES AND SERVICES INC. et al.	:
	:
Counterclaim Defendants	:
-----X	

**RESPONSE OF PLAINTIFFS TO DEFENDANTS' FIRST SET OF  
INTERROGATORIES**

Pursuant to Rules 33 of the Federal Rules of Civil Procedures, Plaintiffs object and respond to Defendants' First Set of Interrogatories as follows.

Plaintiffs object to the interrogatories, including the definitions and instructions therein, to the extent they impose obligations beyond those prescribed by the Federal Rules of Civil Procedure and the local rules of the United States District Court for the Eastern District of New York. Where the answer to an interrogatory may be derived or ascertained from business records of Plaintiffs, and counsel for Plaintiffs believes the burden of deriving or ascertaining the answer to such interrogatory upon audit,

examination or inspection of such business records is substantially the same for Defendants as for Plaintiffs reference will be made to documents to be produced or that have been produced under Rule 33(d) and counsel for Defendants will, have a reasonable opportunity to examine, audit or inspect such records during normal business hours and to make any copies, compilations, abstracts or summaries at the Offices of Gerard F. Dunne, or a location agreed to by the parties.

#### GENERAL OBJECTIONS

1. Plaintiffs object to the interrogatories to the extent they seek information protected from disclosure by the attorney-client, work product, or any other privilege or immunity. Documents subject to such privileges will be identified pursuant to Rule 26(b)(5) prior to any production thereof.

2. All objections and answers are made by Plaintiffs are subject to and without in any way waiving or intending to waive the right to object to other discovery practices and procedures involving or relating to the subject matter of the interrogatories.

3. Plaintiffs object to the interrogatories to the extent they seek information or documents and things pertaining to activities, policies, practices, information or procedures of any other party, or any officer, director, shareholder, agent, employee, trustee, attorney in fact, thereof, unless such documents pertain to activities of Plaintiffs.

#### Interrogatories and Responses

1. Identify all persons who have information regarding Defendants' alleged

purchase and importation into the United States of vacuum cleaner parts or other products acquired from Xu Shihui, Omi and/or Startrade which Plaintiffs claim were manufactured by Xu Shihui, Omi and/or Startrade with the use of Plaintiffs' alleged trade secrets, tooling, molds, or related intellectual property of Plaintiffs, including all unidentified persons referred to by Plaintiffs' counsel in open court during the Initial Conference with Magistrate Judge Gary R. Brown on March 29, 2017.

Response:

As presently known, Mark Genoa, Scott Genoa of Imig, Inc. and Nationwide Sales and Service Inc., at 303 Smith Street Farmingdale, New York 11735. Xu Shihui contact telephone 8613901131146 and residing in the People's Republic of China having a business address at No. 158-82, Huashan Road, Fengqiao Industrial Park, New District, Suzhou, Jiangsu, and others employed by Omi Electric Appliance Company Co., Ltd. a limited corporation of the People's Republic of China having its primary place of business at No. 158-82, Huashan Road, Fengqiao Industrial Park, New District, Suzhou, Jiangsu, China and Beijing China Base Startrade Co., Ltd. a limited corporation of the People's Republic of China having its primary place of business at B-2306, Sun & Moon Plaza, Number 17, Fangcheng, Yuan, Fangzhuang, Beijing, China 100078.

Greg and Dan Seck and others in the employ of the Defendants, Howard Levine and other employees of Steel City Vacuum Company Inc., Westmoreland Technology Park 1, 160 Westec Drive, Mount Pleasant Pa 15666.

Brad Carter and other employees of A.E. Carter of 2550 S 2570 W, Salt Lake City Ut. 84119; employees of Electric Sweeper Service Co., 1933 Highland Rd, Twinsburg Ohio 44087; Mark Peippers and other employees of Desco Supply Co., 75 Oser Ave, Hauppauge NY 11788; employees of Johnny Vac, 10975 Boul Louis-h Lafontaine, Ste 100, Canada Anjou QC H1J2E8; Tony Lagrecca and other employees of Edmar Corporation, 100 Armstrong Rd, Plymouth MA 02360; John Gehring and other employees of Carmens Distributions, 4585 Poth Rd, Columbus OH 43213; Terry Rogers and other employees of Tip Top Parts, 19578 55a Ave, Surrey Bc Canada V3S 8P8; Tim Rodgers and other employees at Merrick Vac, 176 Merrick Road, Merrick, New York 11566; Ed Hibbert and other employees of Hibberty Wholesale, 2610-3 Ave Ne, Calgary Ab Canada T2A 2L5; Dan Heidinga and other employees of Bissell Corp, 2345 Walker Ave NW, Grand Rapids MI 49544; employees of Vacuum Systems International, 9090 Bank Street, Valley View OH 44125; employees at Sandia Plastics, 15571 Container Lane, Huntington Beach CA 92649; Monti Bisson and other employees at Montgomery Designs, 15651 Container Lane, Huntington Beach CA 92649.

Frank Vinnetari, Peter Salvato and Julie Steele of Import Commodity Group, 500 Merrick Road, Lynbrook, New York 11563.

2. Identify all products imported into the United States, offered for sale or sold by Defendants which Plaintiffs claim were manufactured by Xu Shihui, Omi and/or Startrade using the trade secrets, proprietary tooling and molds, or other intellectual property of

Plaintiffs.


Response:

See documents to be produced pursuant to Rule 33(d). All vacuum cleaner parts acquired from Omi and/or Startrade or any other company controlled or authorised by Xu Shihui to manufacture vacuum cleaner parts from tooling owned by Plaintiffs.

The undersigned hereby declares that he is an officer of the Plaintiffs Imig, Inc. and Nationwide Sales and Service Inc. and has reviewed the responses to the interrogatories noted above and believes same to be true and correct to the best of the knowledge and belief of Imig, Inc. and Nationwide Sales and Service Inc.; and makes this statement with the knowledge that any false statements made willfully may subject him to criminal charges of perjury under the laws of the United States.

Dated: Farmingdale, New York  
May 1, 2017

Respectfully submitted,

  
Mark Genoa

As to objections:  
May 1, 2017

/s/ Gerard F. Dunne  
Gerard F. Dunne  
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